

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
CASE NO: 11-CV-01550/JRT/FLN

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NR86, Inc.,

Plaintiff,

vs.

**RULE 26 INITIAL DISCLOSURES**

K.N. Hitechco., LTD,  
aka K.N. Hitech Co., LTD,

Defendant,

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Pursuant to Rules 26 (a)(1) of the Federal Rules of Civil Procedure, plaintiff NR86, Inc., by and through counsel, hereby submits its Initial Disclosures.

- A. the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claim or defenses, unless solely for impeachment, identifying the subjects of the information;

**RESPONSE:**

Pat Brassill	NR86	See affidavits previously filed herein
Alex Alexander Director of Procurement (773) 794-1994	RIDDELL SPORTS 9801 W. Higgins Rd. Rosemont, IL 60018	Mr. Alexander was involved in and knowledgeable of Plaintiff's role in facilitating Defendant's direct business Relationship with RIDDELL

Ken Kuhlman Purchasing Manager (440) 366-8225	RIDDELL SPORTS 669 Sugar Lane Elyria, OH 44035	Mr. Kuhlman is knowledgeable of nature, pricing and dollar values of plaintiff's business with RIDDELL prior to Plaintiff facilitating Defendant's direct business relationship with RIDDELL and is also knowledgeable of nature, pricing and dollar values of Defendant's business with RIDDELL after Defendant was given direct access
Jay Turkbas Executive Vice President (763) 253-1421	SHOCK DOCTOR, Inc. 3300 Fernbrook Lane N Suite 250 Plymouth, MN 55447	Mr. Turkbas is knowledgeable of Plaintiff's relationship with SHOCK DOCTOR, Defendant's pricing, value of transactions with SHOCK DOCTOR and Defendant's obligation to pay Plaintiff commissions on Defendant's sales to SHOCK DOCTOR
Paul M. Larson Director 011 661 807-8273	FIFTH ELEMENT TRADING T.I.T. Tower, Suite 6603 861/8 Soi Wat Pai Nguhn Satupradit Rd, Bangkorlaem Bangkok 10120 Thailand	Mr. Larson is knowledgeable about invalidity of Defendant's counter claims and contract between Plaintiff and Defendant. He is also knowledgeable of Plaintiff's business prior to February 2009.

- B. a copy of, or a description by category and location of, all documents electronically stored information and tangible things that are in the possession, custody or control of the party that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

**RESPONSE:** See bates stamped documents NR86 000001- NR86 000089. These documents were produced on August 19, 2011 and may have been previously filed as exhibits.

- C. a computation of any category of damages claimed by the disclosing party, making available for inspection and copying under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure on which such computation is based, including materials bearing on the nature and extent of injuries suffered; and

**RESPONSE:** Damages are based upon 10% commission on sales to Shock Doctor and Riddell as of May 12, 2011. This totals \$115,655.78. This computation includes a reduction of \$5,716.30 which is an amount paid by defendant to plaintiff and applied to the outstanding commission debt.

- D. for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action to indemnify or reimburse for payments made to satisfy the judgment.

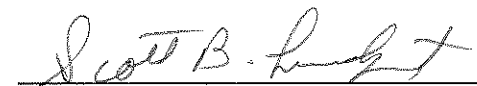
**RESPONSE:** N/A

(2). Disclosure of Expert Testimony.

**RESPONSE:** N/A

Dated: August 19, 2011

LUNDQUIST LAW OFFICES  
A Professional Association



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